

KENNETH D. SULZER, CA State Bar No. 120253
ksulzer@proskauer.com
ENZO DER BOGHOSIAN, CA State Bar No. 211351
ederboghossian@proskauer.com
ADAM W.G. FREED, CA State Bar No. 272538
afreed@proskauer.com
PROSKAUER ROSE LLP
2049 Century Park East, 32nd Floor
Los Angeles, CA 90067-3206
Telephone: (310) 557-2900
Facsimile: (310) 557-2193

Attorneys for Defendant,
AMN SERVICES, LLC (improperly
named herein as "AMN SERVICES, INC.
dba Medical Express")

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHRISTOPHER O'SULLIVAN,
individually and on behalf of himself and
others similarly situated,

Plaintiff,

v.

AMN SERVICES, INC. dba Medical
Express, and DOE 1 through and
including DOE 100,

Defendants.

Case No. CV-12-2125 JCS

**STIPULATION AND
[PROPOSED] ORDER
CONTINUING HEARING AND
CASE MANAGEMENT
CONFERENCE SCHEDULED
FOR JULY 20, 2012 AND
RESETTING DEADLINES**

Hon. Joseph C. Spero

1 IT IS HEREBY STIPULATED between counsel for Plaintiff Christopher
2 O'Sullivan ("Plaintiff"), counsel for Defendant AMN Services, LLC (which the
3 defense claims to have been improperly named herein as "AMN SERVICES, INC.
4 dba Medical Express") ("Defendant"), and counsel for Plaintiff Alice Ogues in the
5 matter *Ogues v. AMN Services LLC.*, case number 4:12-CV-03190 JCS (collectively
6 "the Parties"), pursuant to Local Rules 6-2 and 7-1, as follows:

7 WHEREAS, on July 12, 2012, the Court entered an order determining that
8 *Ogues v. AMN Services LLC.*, case number 4:12-CV-03190 JCS is related to the
9 above-captioned matter;

10 WHEREAS, the Parties agree that the hearing on Plaintiff's Motion to Strike
11 and the Case Management Conference scheduled for July 20, 2012 should be
12 continued until the rescheduled Case Management Conference;

13 WHEREAS, the Parties agree that the dates for conferences, disclosures and
14 report required by Fed. R. Civ. P. 16 and 26 should be reset;

15 AND WHEREAS, the Parties agree that the hearing on Plaintiff's Motion to
16 Strike and a joint Case Management Conference with the *Ogues* matter should be
17 rescheduled for August 31, 2012 or another date set by the Court.

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1
2 Dated: July 13, 2012

PROSKAUER ROSE LLP
KENNETH D. SULZER
ENZO DER BOGHOSSIAN
ADAM W.G. FREED

3
4
5 /s/ Kenneth D. Sulzer
Kenneth D. Sulzer

6 Attorneys for Defendant
7 AMN SERVICES, LLC (improperly
named herein as "AMN SERVICES, INC.
8 dba Medical Express")

9 Dated: July 13, 2012

DAVID S. HARRIS
NORTH BAY LAW GROUP

10 /s/ David S. Harris
11 David S. Harris
12 Attorneys for Plaintiff,
CHRISTOPHER O'SULLIVAN

13 Dated: July 13, 2012

SHAUN SETAREH
LAW OFFICES OF SHAUN SETAREH

14
15 /s/ Shaun Setareh
Shaun Setareh
16 Attorneys for Plaintiff,
ALICE OGUES, *Ogues v. AMN Services LLC.*,
17 case number 4:12-CV-03190 JCS
18
19
20
21
22
23
24
25
26
27
28

[PROPOSED] ORDER

The Court having considered the papers and pleadings on file, and cause appearing,

HEREBY GRANTS the Parties' Stipulation.

IT IS ORDERED that the ~~hearing on Plaintiff's Motion to Strike and the Case~~ is Management Conference scheduled for July 20, 2012 ~~are~~ CONTINUED;

IT IS FURTHER ORDERED that the dates for conferences, disclosures and report required by Fed. R. Civ. P. 16 and 26 are reset;

IT IS FURTHER ORDERED that the ~~hearing on Plaintiff's Motion to Strike~~ and a joint Case Management Conference with *Ogues v. AMN Services, LLC*, et al. 12-cv-03190 JCS, will be reschedule for August 31, 2012, at 1:30 PM. The joint case management conference statement shall be due by August 24, 2012.

DATED: July 17, 2012

HON. JOSEPH C. SPERO

